

Dee May
Director
Federal Regulatory Issues

0008

NYNEX

June 13, 1996

Ex Parte

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JUN 15 1996

Federal Communications Commission
Office of Secretary

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

DOCKET FILE COPY ORIGINAL


Re: CC 96-98 Implementation of the Local Competition Provisions in the Telecommunications Act of 1996

Dear Mr. Caton:

Susanne Guyer and I met with Daniel Gonzalez of Commissioner Chong's office today to discuss NYNEX's position regarding the unbundling of network elements and network interconnection points. The issues discussed are outlined on the attached.

Please contact me if you have any questions.

Sincerely,



Attachment

cc: D. Gonzalez

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***cc 96-98 Impementation of the
Telecommunications Act of 1996***

UNBUNDLED NETWORK ELEMENTS

June 13, 1996

THE GOALS OF NYNEX AND THE FCC ARE THE SAME:

- **IMPLEMENT THE TELECOMMUNICATIONS
ACT OF '96 AS QUICKLY AS POSSIBLE**
- **CREATE CUSTOMER CHOICE THROUGH
COMPETITION**
- **MAINTAIN AND IMPROVE QUALITY,
RELIABILITY AND AVAILABILITY OF
CUSTOMER SERVICES**

A MANAGEABLE, PRAGMATIC IMPLEMENTATION PROCESS IS NEEDED:

- **THE FOCUS SHOULD BE ON IDENTIFYING THOSE ELEMENTS, INTERCONNECTION POINTS AND FUNCTIONS NECESSARY TO FACILITATE COMPETITION IN THE SHORT TERM.**
- **THE REAL ISSUES TO BE DECIDED ARE CUSTOMER SERVICE, THE OPERATIONAL PRACTICALITY AND THE ABILITY TO ADMINISTER THE ARRANGEMENT IN A COMPETITIVE BUSINESS ENVIRONMENT.**

THE NETWORK IS DESIGNED AS AN INTEGRATED WHOLE:

- **THERE ARE “NATURAL”, READILY
IMPLEMENTED INTERCONNECTION POINTS**
- **THERE ARE OTHER “POSSIBLE”
INTERCONNECTION POINTS, BUT THESE
WERE NOT DESIGNED TO SUPPORT
DEMAND ACCESS**
 - » **CASE BY CASE ANALYSIS AND METHODS REQUIRED**
 - » **ACCESS BASED ON TARGETED REQUESTS**

NYNEX URGES FCC TO ADOPT A TWO STAGE APPROACH:

- **ESTABLISH A MINIMUM INITIAL SET OF
UNBUNDLED ELEMENTS:**
 - » MEETS THE BULK OF INTERCONNECTORS' NEEDS
 - » WILL JUMPSTART COMPETITION QUICKLY
- **ESTABLISH A WELL DEFINED PROCESS
FOR:**
 - » IDENTIFYING, NEGOTIATING AND SATISFYING
ADDITIONAL NEEDS OF INDIVIDUAL
INTERCONNECTORS
 - » ELIMINATES MASS DISRUPTION IN EXISTING SYSTEMS
AND PROCESSES

INITIAL SET OF UNBUNDLED ELEMENTS CAN BE DIVIDED INTO FOUR FUNCTIONAL CATEGORIES:

- **LOOP**
- **TRANSPORT**
- **SWITCHING**
- **SIGNALING**

SUGGESTED INITIAL SET OF UNBUNDLED ELEMENTS:

- **LOOP:** The loop from the customer premises to the incumbent LEC's serving wire center.
- **TRANSPORT:**
 - » DEDICATED TRANSPORT
 - » COMMON TRANSPORT
- **SWITCHING:**
 - » END OFFICE
 - » TANDEM
- **SIGNALING**
 - » SIGNALING LINK
 - » SIGNALING TRANSFER POINT (STP) PORT

CONCLUSION:

- **THE FCC SHOULD FOCUS ON ESTABLISHING A SET OF INTERCONNECTION POINTS AND UNBUNDLED NETWORK ELEMENTS WHICH:**
 - » **MEET THE MAJORITY OF INTERCONNECTORS' REQUIREMENTS**
 - » **IS BASED ON ACTUAL, NOT HYPOTHETICAL DEMAND**
 - » **ALLOWS FOR RAPID INTRODUCTION OF COMPETITION FOR LOCAL EXCHANGE SERVICES**